

1 ROBERT M. LIEBER, ESQ. SBN: 039976
2 NAKI M. IRVIN, ESQ. SBN: 094120
3 MARGOLIS & TISMAN LLP
4 601 Montgomery Street, Suite 2030
5 Telephone: (415) 986-2144
6 Facsimile: (415) 986-4461
7 Email: rlieber@winlaw.com
8 nakim@winlaw.com

9 Attorneys for Defendant
10 INDUSTRIAL LIGHT AND MAGIC, a division of
11 LUCASFILM ENTERTAINMENT COMPANY LTD.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

DREW KLAUSNER;

Plaintiff,

v.

INDUSTRIAL LIGHT AND MAGIC, a
division of LUCASFILM ENTERTAINMENT
COMPANY LTD. and DOES 1 through 25,
inclusive,

Defendants.

Case No. CV 09-03502-CW

**STIPULATION FOR DEPOSITIONS OF
DR. HERBERT SCHREIER & KATE
AMATRUDA & ~~PROPOSED~~ ORDER**

[Fed. R. Civ. Proc. 29; Civ. L.R. 6-2]

Action Filed: July 30, 2009

Trial Date: April 11, 2011



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STIPULATION OF THE PARTIES

Pursuant to Federal Rule of Civil Procedure 29 and Civil Local Rule 6-2, the Parties to this action, by and through their counsel of record, hereby stipulate and request the Court to order that the depositions of Dr. Herbert Schreier and Kate Amatruda may be taken after the fact discovery deadline in this case.

IT IS SO STIPULATED.

DATED: July 27, 2010

MARGOLIS & TISMAN LLP

By: /s/ Naki M. Irvin
NAKI M. IRVIN

Attorneys for Defendant
INDUSTRIAL LIGHT AND MAGIC, a
division of LUCASFILM ENTERTAINMENT
COMPANY LTD.

DATED: July __, 2010

PIERCE & SHEARER LLP

By: [Signature]
STACY NORTH
Attorneys for Plaintiff
DREW KLAUSNER

PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 7/30/2010

[Signature]
HON. CLAUDIA WILKEN
United States District Court Judge

DECLARATION OF NAKI M. IRVIN

I, Naki M. Irvin, declare as follows:

1. I have personal knowledge of the facts set forth below.

2. I am a partner with Margolis & Tisman LLP, which is counsel of record in this action for Defendant Industrial Light & Magic, a division of Lucasfilm Entertainment Company Ltd. ("Defendant"). Pursuant to Civil Local Rule 6-2(a), I make this declaration to accompany the stipulated request to allow the depositions of Dr. Herbert Schreier and Kate Amatruda to occur after the fact discovery deadline, regardless of whether they are designated as expert witnesses.

3. The reason for this stipulated request is scheduling issues. Defendant's counsel was engaged in the jury trial of another case that lasted the entire month of June 2010. Thereafter, Defendant's counsel sought to depose these witnesses on July 30, 2010. However, Plaintiff's counsel, Stacy North, notified Defendant's counsel that she was busy that week. I am informed and believe that Dr. Herbert Schreier requested his deposition to take place on August 12, 2010, instead of July 30. In addition, I am informed and believe that Kate Amatruda is currently out of town and not expected to return until September 14, 2010.

4. The fact discovery and expert discovery deadlines were extended once in this case. There have been no other previous time modifications.

5. The requested time modification will not delay the trial, which is not scheduled to begin until April 11, 2010, or otherwise affect the schedule for this case.

I declare, under penalty of perjury, under the laws of the United States, that the foregoing is true and correct, and that this declaration was executed this 27th day of July, 2010, at San Francisco, California.

/s/ Naki M. Irvin
NAKI M. IRVIN